IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
MALLINCKRODT PLC, et al.,) Case No. 20-12522 (JTD)
Debtors. ¹) (Jointly Administered)
))
OPIOID MASTER DISBURSEMENT TRUST II,) Adv. Pro. No. 22-50435 (JTD)
Plaintiff,))
v.)
ARGOS CAPITAL APPRECIATION MASTER FUND LP, et al.,)))
Defendants. ²))

NOTICE OF SECOND AMENDED³ AGENDA FOR HEARING SCHEDULED FOR APRIL 19, 2023 AT 1:00 P.M. (PREVAILING EASTERN TIME), BEFORE THE HONORABLE JOHN T. DORSEY AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE⁴

A complete list of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors' claims and noticing agent at http://restructuring.ra.kroll.com/Mallinckrodt. The Reorganized Debtors' mailing address is 675 McDonnell Blvd., Hazelwood, Missouri 63042.

A complete list of the defendants in the adversary proceeding is set forth in the caption of the Debtors' *Amended Adversary Complaint for Injunctive Relief Pursuant to 11 U.S.C. § 105* [Adv. Docket No. 15] and in Exhibits 1 and 2 thereto.

Amended items appear in bold.

⁴ All motions and other pleadings referenced herein are available online at the following address: http://restructuring.ra.kroll.com/Mallinckrodt.

THE HEARING WILL BE HELD IN-PERSON IN JUDGE DORSEY'S COURTROOM.
ALL PARTIES, INCLUDING WITNESSES, ARE EXPECTED TO ATTEND IN PERSON
UNLESS PERMITTED TO APPEAR VIA ZOOM.

APPEARANCES AT IN-PERSON COURT PROCEEDINGS USING ZOOM ARE ALLOWED ONLY IN THE FOLLOWING CIRCUMSTANCES: (I) A PARTY WHO FILES A RESPONSIVE PLEADING INTENDS TO MAKE ONLY A LIMITED ARGUMENT; (II) A PARTY WHO HAS NOT SUBMITTED A PLEADING BUT IS INTERESTED IN OBSERVING THE HEARING; (III) A PARTY WHO HAS A GOOD FAITH HEALTH-RELATED REASON AND HAS OBTAINED PERMISSION FROM JUDGE DORSEY'S CHAMBERS TO APPEAR REMOTELY, OR (IV) OTHER EXTENUATING CIRCUMSTANCES AS DETERMINED BY JUDGE DORSEY.

IF YOU INTEND TO APPEAR VIA ZOOM, YOU ARE REQUIRED TO REGISTER IN ADVANCE.

PLEASE USE THE FOLLOWING ZOOM REGISTRATION LINK:

 $\frac{https://debuscourts.zoomgov.com/meeting/register/vJItcOmgqzspG8l8rXzOR8l5vTHxn}{FtoLJc}$

I. RESOLVED MATTERS:

1. Reorganized Debtors' Fifteenth Omnibus Objection to Certain Amended and Replaced Claims (Non-Substantive) [Docket No. 8610 – filed March 17, 2023]

Objection/Response Deadline: April 10, 2023 at 4:00 p.m. (ET)

Objections/Responses Received: None at this time.

Related Documents:

- i. Notice of Submission of Copies of Proofs of Claim Regarding Reorganized Debtors' Fifteenth Omnibus Objection to Certain Amended and Replaced Claims (Non-Substantive) [Docket No. 8637 filed April 5, 2023]
- ii. Certificate of No Objection Regarding Reorganized Debtors' Fifteenth Omnibus Objection to Certain Amended and Replaced Claims (Non-Substantive) [Docket No. 8651 filed April 11, 2023]
- iii. Order Sustaining Reorganized Debtors' Fifteenth Omnibus Objection to Certain Amended and Replaced Claims (Non-Substantive) [Docket No. 8656 entered April 17, 2023]

<u>Status</u>: On April 17, 2023, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

2. General Unsecured Claims Trustee's Second Omnibus Objection to Certain Late-Filed Asbestos Claims (Non-Substantive) [Docket No. 8617 – filed March 20, 2023]

Objection/Response Deadline: April 3, 2023 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Certification of No Objection Regarding General Unsecured Claims Trustee's Second Omnibus Objection to Certain Late-Filed Asbestos Claims (Non-Substantive [<u>Docket No.</u> <u>8635</u> – filed April 4, 2023]
- ii. Order Sustaining General Unsecured Claims Trustee's Second Omnibus Objection to Certain Late Filed Asbestos Claims (Non-Substantive) [Docket No. 8636 entered April 5, 2023]

<u>Status</u>: On April 5, 2023, the Court entered an order regarding this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

II. <u>CONTINUED MATTERS</u>:

3. Reorganized Debtors' Sixteenth Omnibus Objection to Certain Claims (Substantive) [<u>Docket No.</u> 8611 – filed March 17, 2023]

Objection/Response Deadline: April 10, 2023 a

April 10, 2023 at 4:00 p.m. (ET); extended to April 24, 2023 at 4:00 p.m. for Linde Inc. as agent for Linde Healthcare AB and other Linde group companies ("<u>Linde Inc.</u>"); extended to April 25, 2023 at 4:00 p.m. (ET) for The Children's

Hospital of Philadelphia

Objections/Responses Received:

- A. Informal Response of The Children's Hospital of Philadelphia
- B. Informal Response of Linde Inc.

Related Documents:

 Notice of Submission of Copies of Proofs of Claim Regarding Reorganized Debtors' Sixteenth Omnibus Objection to Certain Claims (Substantive) [<u>Docket No. 8638</u> – filed April 5, 2023]

Status: The Debtors are working to resolve the informal comments received to the objection. The hearing on this matter is continued to the next omnibus hearing scheduled for May 9, 2023 at 10:00 a.m. (ET).

4. Reorganized Debtors' Seventeenth Omnibus Objection to Certain Claims (Substantive) [Docket No. 8612 – filed March 17, 2023]

Objection/Response Deadline: April 10, 2023 at 4:00 p.m. (ET); extended to April 25, 2023 at 4:00 p.m. (ET) for Cardinal Health, Inc., *et al.*

Objections/Responses Received:

A. Informal Response of Cardinal Health, Inc., et al.

Related Documents:

 Notice of Submission of Copies of Proofs of Claim Regarding Reorganized Debtors' Seventeenth Omnibus Objection to Certain Claims (Substantive) [<u>Docket No. 8639</u> – filed April 5, 2023]

Status: The Debtors are working to resolve the informal comments received to the objection. The hearing on this matter is continued to the next omnibus hearing scheduled for May 9, 2023 at 10:00 a.m. (ET).

5. Reorganized Debtors' Eighteenth Omnibus Objection to Certain Claims (Non-Substantive) [Docket No. 8613 – filed March 17, 2023]

Objection/Response Deadline: April 10, 2023 at 4:00 p.m. (ET)

Objections/Responses Received:

A. Informal Response of Confidential Acthar Claimant 23912

Related Documents:

 Notice of Submission of Copies of Proofs of Claim Regarding Reorganized Debtors' Eighteenth Omnibus Objection to Certain Claims (Non-Substantive) [Docket No. 8640 – filed April 5, 2023]

Status: The Debtors have resolved the informal comment received to the objection. The Debtors intend to submit a revised form of order reflecting such resolution. The hearing on this matter is continued to the next omnibus hearing scheduled for May 9, 2023 10:00 a.m. (ET).

II. <u>ADVERSARY MATTERS</u>:

6. Motion of the Opioid Master Disbursement Trust II for Entry of an Order Further Enlarging the Time to Effectuate Service of Process and Extending Deadline to Produce Trading Information [Adv. Pro. No. 22-50435 (JTD) – Adv. Docket No. 124 – filed March 14, 2023]

Objections/Responses Received:

A. Defendants' (1) Limited Objection to Motion of the Opioid Master Disbursement Trust II for Entry of an Order Further Enlarging the Time to Effectuate Service of Process and Extending Deadline to Produce Trading Information, and (2) Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," "Financial Institutions," "Stockbrokers," and Dissolved Entities [Adv. Pro. No. 22-50435 (JTD) – Adv. Docket No. 132 – filed March 28, 2023]

- i. Declaration of Ross E. Firsenbaum in Support of Defendants' (1) Limited Objection to Motion of the Opioid Master Disbursement Trust II for Entry of an Order Further Enlarging the Time to Effectuate Service of Process and Extending Deadline to Produce Trading Information, and (2) Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," "Financial Institutions," "Stockbrokers," and Dissolved Entities [Adv. Pro. No. 22-50435 (JTD) Adv. Docket No. 133 filed March 28, 2023]
- B. Joinder of Paulson & Co. Inc. and Consonance Capital Management LP in the Defendants' (1) Limited Objection to Motion of the Opioid Master Disbursement Trust II for Entry of an Order Further Enlarging the Time to Effectuate Service of Process and Extending Deadline to Produce Trading Information, and (2) Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," "Financial Institutions," "Stockbrokers," and Dissolved Entities [Adv. Pro. No. 22-50435 (JTD) Adv. Docket No. 134 filed March 28, 2023]
- C. Joinder of Tradebot Systems, Inc. in the Defendants' (1) Limited Objection to Motion of the Opioid Master Disbursement Trust II for Entry of an Order Further Enlarging the Time to Effectuate Service of Process and Extending Deadline to Produce Trading Information, and (2) Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," "Financial Institutions," "Stockbrokers," and Dissolved Entities [Adv. Pro. No. 22-50435 (JTD) <u>Adv. Docket No. 137</u> filed March 31, 2023

Related Documents:

- Plaintiff's Reply in Support of its Motion to Further Enlarge the Time to Effectuate Service of Process and Extend Deadline to Produce Trading Information [Adv. Pro. No. 22-50435 (JTD) – <u>Adv. Docket No. 138</u> – filed April 3, 2023]
- ii. Alias Summons and Notice of Pretrial Conference in an Adversary Proceeding [Adv. Pro. No. 22-50435 (JTD) <u>Adv. Docket No. 140</u> filed April 11, 2023]
- iii. Notice of Hearing [Adv. Pro. No. 22-50435 (JTD) <u>Adv. Docket No. 142</u>– filed April 12, 2023]
- iv. Joinder of HRT Financial LP, HRT Execution Services LLC, Jump Trading, LLC, and Simplex Trading LLC in Support of (1) Defendants' Limited (I) Objection to Motion of the Opioid Master Disbursement Trust II for Entry of an Order Further Enlarging the Time to Effectuate Service of Process and Extending Deadline to Produce Trading Information, and (II) Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," "Financial Institutions," "Stockbrokers," and Dissolved Entities, and (2) Defendants' Reply in Support of Their Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," "Financial Institutions," "Stockbrokers," and Dissolved Entities [Adv. Pro. No. 22-50435 (JTD) Adv. Docket No. 146 filed April 17, 2023]

Status: The hearing on this matter is going forward.

7. Defendants' (1) Limited Objection to Motion of the Opioid Master Disbursement Trust II for Entry of an Order Further Enlarging the Time to Effectuate Service of Process and Extending Deadline to Produce Trading Information, and (2) Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," "Financial Institutions," "Stockbrokers," and Dissolved Entities [Adv. Pro. No. 22-50435 (JTD) – Adv. Docket No. 132 – filed March 28, 2023]

Objections/Responses Received:

- A. Plaintiff's Reply in Support of its Motion to Further Enlarge the Time to Effectuate Service of Process and Extend Deadline to Produce Trading Information [Adv. Pro. No. 22-50435 (JTD) Adv. Docket No. 138 filed April 3, 2023]
- B. Opposition of the Opioid Master Disbursement Trust II to Defendants' Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," "Financial Institutions," "Stockbrokers," and Dissolved Entities [Adv. Pro. No. 22-50435 (JTD) Adv. Docket No. 141 filed April 11, 2023]
 - i. Notice of Filing of Appendices to Opioid Master Disbursement Trust II's Protocol for the Dismissal of Conduits, Non-Transferees, "Stockbrokers," "Financial Institutions," "Financial Participants," and Dissolved Entities [Adv. Pro. No. 22-50435 (JTD) <u>Adv. Docket No. 144</u> filed April 17, 2023]

Related Documents:

- Declaration of Ross E. Firsenbaum in Support of Defendants' (1) Limited Objection to Motion of the Opioid Master Disbursement Trust II for Entry of an Order Further Enlarging the Time to Effectuate Service of Process and Extending Deadline to Produce Trading Information, and (2) Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," "Financial Institutions," "Stockbrokers," and Dissolved Entities [Adv. Pro. No. 22-50435 (JTD) – <u>Adv. Docket No.</u> 133 – filed March 28, 2023]
- ii. Joinder of Paulson & Co. Inc. and Consonance Capital Management LP in the Defendants' (1) Limited Objection to Motion of the Opioid Master Disbursement Trust II for Entry of an Order Further Enlarging the Time to Effectuate Service of Process and Extending Deadline to Produce Trading Information, and (2) Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," "Financial Institutions," "Stockbrokers," and Dissolved Entities [Adv. Pro. No. 22-50435 (JTD) Adv. Docket No. 134 filed March 28, 2023]
- iii. Joinder of Tradebot Systems, Inc. in the Defendants' (1) Limited Objection to Motion of the Opioid Master Disbursement Trust II for Entry of an Order Further Enlarging the Time to Effectuate Service of Process and Extending Deadline to Produce Trading Information, and (2) Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," "Financial Institutions," "Stockbrokers," and Dissolved Entities [Adv. Pro. No. 22-50435 (JTD) <u>Adv. Docket No. 137</u> filed March 31, 2023]

- iv. Defendants' Reply in Support of Their Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," "Financial Institutions," "Stockbrokers," and Dissolved Entities [Adv. Pro. No. 22-50435 (JTD) <u>Adv. Docket No. 145</u> filed April 17, 2023]
- v. Joinder of HRT Financial LP, HRT Execution Services LLC, Jump Trading, LLC, and Simplex Trading LLC in Support of (1) Defendants' Limited (I) Objection to Motion of the Opioid Master Disbursement Trust II for Entry of an Order Further Enlarging the Time to Effectuate Service of Process and Extending Deadline to Produce Trading Information, and (II) Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," "Financial Institutions," "Stockbrokers," and Dissolved Entities, and (2) Defendants' Reply in Support of Their Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," "Financial Institutions," "Stockbrokers," and Dissolved Entities [Adv. Pro. No. 22-50435 (JTD) Adv. Docket No. 146 filed April 17, 2023]
- vi. Joinder of Paulson & Co. Inc. and Consonance Capital Management LP in the Defendants' Reply in Support of Their Motion for Entry of the Proposed Protocol for the Dismissal of Conduits, Non-Transferees, "Financial Participants," 'Financial Institutions," "Stockbrokers," and Dissolved Entities [Adv. Pro. No. 22-50435 (JTD) Adv. Docket No. 148 filed April 17, 2023]

<u>Status</u>: The hearing on this matter is going forward.

Dated: April 18, 2023

/s/ Amanda R. Steele

RICHARDS, LAYTON & FINGER, P.A.

Mark D. Collins (No. 2981)

Michael J. Merchant (No. 3854)

Amanda R. Steele (No. 5530)

Brendan J. Schlauch (No. 6115)

One Rodney Square

920 N. King Street

Wilmington, Delaware 19801 Telephone: (302) 651-7700

Facsimile: (302) 651-7701 Email: collins@rlf.com

> merchant@rlf.com steele@rlf.com schlauch@rlf.com

- and -

George A. Davis (pro hac vice) George Klidonas (pro hac vice) Andrew Sorkin (pro hac vice)

Anupama Yerramalli (pro hac vice)

LATHAM & WATKINS LLP

1271 Avenue of the Americas New York, New York 10020

Telephone: (212) 906-1200 Facsimile: (212) 751-4864

Email: george.davis@lw.com

george.klidonas@lw.com andrew.sorkin@lw.com anu.yerramalli@lw.com

- and -

Jeffrey E. Bjork (pro hac vice)

LATHAM & WATKINS LLP

355 South Grand Avenue, Suite 100

Los Angeles, California 90071

Telephone: (213) 485-1234 Facsimile: (213) 891-8763 Email: jeff.bjork@lw.com

- and -

Jason B. Gott (pro hac vice)

LATHAM & WATKINS LLP

330 North Wabash Avenue, Suite 2800

Chicago, Illinois 60611

Telephone: (312) 876-7700 Facsimile: (312) 993-9767 Email: jason.gott@lw.com

Counsel for Reorganized Debtors